

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

JOHN JENNINGS, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

FAIRMOUNT SANTROL HOLDINGS INC.,
JENNIFFER D. DECKARD, MATTHEW F.
LEBARON, WILLIAM E. CONWAY,
MICHAEL G. FISCH, CHARLES D.
FOWLER, STEPHEN J. HADDEN,
MICHAEL C. KEARNEY, WILLIAM P.
KELLY, MICHAEL E. SAND, and
LAWRENCE N. SCHULTZ,

Defendants.

Cons. Case No. 1:18-cv-00931-CAB

**MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT,
PRELIMINARY CERTIFICATION
OF THE SETTLEMENT CLASS,
AND APPROVAL OF NOTICE TO
THE SETTLEMENT CLASS**

Plaintiffs John Jennings, Barry Schneider, and Jeffrey Fitzgibbon (“Plaintiffs”), by their counsel, Karon LLC (“Liaison Counsel”), Monteverde & Associates PC and Levi & Korsinsky, LLP, (collectively, “Class Counsel”) in this class action, on behalf of themselves and the other members of the proposed Class (as hereinafter defined) hereby move for an Order granting Preliminary Approval of Settlement, Preliminary Certification of the Settlement Class, and Approval of Notice to the Settlement Class (“Motion”).

In support of this Motion, Plaintiffs rely upon the accompanying memorandum of law, and supporting declaration of Daniel Karon and accompanying exhibits.

Dated: November 9, 2018

Respectfully submitted,

KARON LLC

s/Daniel R. Karon

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